

GOTTLIEB & ASSOCIATES
ATTORNEYS

VIA ECF

150 E. 18th St., Suite PHR • New York, NY 10003
Tel (212) 228-9795 • Fax (212) 982-6284

Hon. Edgardo Ramos
United States District Court Judge
United States District Court Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

NYJG@aol.com

Re: Camacho v. Emerson College, 1:18-cv-10600 (S.D.N.Y.)
Camacho v. Northeastern University, 1:18-cv-10693 (S.D.N.Y.)
Camacho v. Rider University, 1:18-cv-10700 (S.D.N.Y.)

Dear Judge Ramos:

The undersigned represent all parties in the three above entitled actions. By way of background, Defendants in these actions filed correspondence requesting a pre-motion conference in connection with their anticipated motions to dismiss under Fed. R. Civ. P. 12(b)(2) on March 5, 2019. Plaintiff will file an Amended Complaint as of right and pursuant to Fed. R. Civ. P. 15(a) on or before March 26, 2019, which will render as moot Defendants' pending applications.

The parties respectfully request that the pre-motion conference scheduled for March 15, 2019 at 11:30 AM be adjourned *sine die* in light of Plaintiff's anticipated amendment. Further, the parties respectfully request that Defendants have up to and including April 26, 2019 to respond to the Amended Complaint.

Plaintiff has also filed a motion seeking consolidation of these and 17 other actions that he has commenced against colleges and universities in the action entitled, *Camacho v. Bennington College Corporation*, 1:18-cv-10541-DAB, which is pending before Judge Batts, and which Defendants will oppose. Plaintiff will promptly inform the Court of the outcome of this motion. Defendants do not consent to a stay of these actions pending a decision on the consolidation application.

We thank the Court for its time and attention to these matters.

DATED: March 13, 2019

For Plaintiff:

by: 

Jeffrey M. Gottlieb, Esq.

Gottlieb & Associates

150 East 18th Street

New York, NY 10003

Email: nyjg@aol.com

Phone: (212) 228-9795

Fax: (212) 982-6284

For Defendant:

by: 

John W. Egan Esq.,

Seyfarth Shaw LLP

620 Eighth Avenue

New York, NY 10018

Email: jegan@seyfarth.com

Phone: (212) 218-5500

Fax: (212) 218-5526